



February 2, 2022

Honorable Chairman Jeb Bradley
Senate Health and Human Services Committee
Legislate Office Building Room 101
North Main St., Concord, NH 03301

RE: NAMI NH Support of SB 373

Dear Chairman and Committee Members:

Thank you for the opportunity to testify today. My name is Holly Stevens, and I am the Director of Public Policy at NAMI New Hampshire, the National Alliance on Mental Illness. On behalf of NAMI NH, I am here today to speak in support of SB 373, relative to coverage for certain mental illnesses. First, NAMI NH would like to thank the New Hampshire Insurance Department (NHID) for asking that this bill be brought forward.

Under current federal law, self-funded plans must “perform and document comparative analyses of the design and application” of nonquantitative treatment limitations (NQTLs) and make them available to the government agency that oversees the administration of the plans. SB 373 would allow the NHID to require fully insured plans to submit these same comparative analysis reports to the NHID. Since the insurance plans are already doing the analysis and compiling the report, there should be no additional burden on plans that offer both fully insured and self-funded plans.

The NHID recently performed a market conduct exam regarding mental health parity and released a report in January 2020. The report stated that there was a “strong indicator of potential non-compliance with non-quantitative treatment limitation...requirements.” Allowing the NHID to have access to reports that the self-funded plans are already submitting to the federal government would provide it with one more tool to assure that NH’s fully insured plans are complying with federal mental health parity requirements.

Given the importance of parity enforcement, NAMI NH urges the committee to vote ought to pass on SB 373. I am happy to answer any questions that you may have.

Sincerely,

A handwritten signature in black ink that reads "Holly A. Stevens". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Holly A. Stevens, Esq.